

Facility Name: Americas Styrenics LLC

Facility Location: 17401 State Route 7 South, Marietta, Ohio

Date of Inspection: April 22, 2019



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, ILLINOIS 60604

DATE: JUN 20 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Americas Styrenics LLC, Marietta, Ohio

FROM: Albana Bega, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Americas Styrenics LLC

Facility Location: 17401 State Route 7 South, Marietta, Ohio

Date of Inspection: April 22, 2019

EPA Inspector(s):

1. Albana Bega, Environmental Engineer
2. Luke Hullinger, Environmental Engineer

Other Attendees

1. Doug Currey, Environmental Health and Safety Specialist, Americas Styrenics LLC (AmSty)
2. Paul Hunt, Senior Process Engineer, AmSty
3. Tim Salyers, Plant Engineer, AmSty
4. Jeffrey Neville, Environmental Specialist, AmSty

Contact Email Address: DJCurrey@amsty.com

Purpose of Inspection: LDAR/Tank CAA Inspection

Facility Type: Chemical facility - polystyrene production

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Date of Inspection: April 22, 2019

Regulations Central to Inspection: 40 C.F.R. Part 63 Subpart JJJ - Leak Detection and Repair (LDAR) program

Arrival Time: 08:45

Departure Time: 16:30

Inspection Type:

- ☐ Unannounced Inspection
☒ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
☒ CBI warning to facility provided

The following information was obtained verbally from Mr. Currey and Mr. Hunt unless otherwise noted.

Process Description:

AmSty produces polystyrene at its Marietta plant (facility). The facility has been in operation since 1955 and has currently 50 employees. AmSty claimed its process information as confidential business information.

TOUR INFORMATION

EPA toured the facility: Yes

The plant was not operating during the inspection due to a five-year planned shutdown. The following were observed during the tour:

- Polystyrene storage and loading area
- Tank farm
- Line 14

Photos and/or Videos: were taken during the inspection.

Field Measurements: were taken during this inspection.

- EPA used two Toxic Vapor Analyzer (TVA) 2020's to conduct LDAR comparative monitoring at the facility.
- EPA calibrated both TVA 2020's before use with the following calibrations gas standards: Zero Air, 500 parts per million by volume (ppm), 2,000 ppm, and 10,000 ppm as methane. The table below summarizes the calibration checks results:

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Methane (ppm)	TVA# A56584 4/22/2019	TVA# A56575 4/22/2019
500	447	460
2,000	1,873	1,920
10,000	9,813	9,370

- EPA monitored all equipment of styrene and toluene tanks.
- The following table summarizes the leaking equipment that were identified by EPA's monitoring:

Tank	Location	TVA# A56575 (ppm)	TVA# A56584 (ppm)
T501	Vent	11,800	11,090
T530	Vacuum breaker	12,900	14,800
T531	Vent	19,100	13,400

RECORDS REVIEW

Records were not provided during the inspection.

CLOSING CONFERENCE

Requested documents:

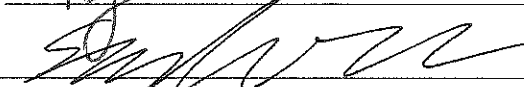
- LDAR database in Microsoft Access
- Copies of the weekly pump checks for the following months: April 2016, June 2016, September 2017, and December 2019
- Last air emission stack test for both heaters
- Copies of the last five years of the 40 C.F.R. Part 63 Subpart JJJ semi-annual reports

Concerns:

- Insulation covering the seal for all Line 14 reactors
- Leaking components of styrene tanks (TVA readings)

SIGNATURES

Report Author:  Date: 6/20/19

Section Chief:  Date: 6/20/19

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Albana Bega	2. Date(s) of Inspection: April 22, 2019
3. Company/Facility Name: Americas Styrenics LLC	4. Street Address, City, State: 17401 State Route 7 South, Marietta, Ohio
5. Number of Images: 4	6. Archival Record Location: C:\Users\ABega\OneDrive - Environmental Protection Agency (EPA)\AmSty-Marietta\Photos

Image Number	File Name	Date and Time (incl. time zone and DST)	Description of Image
1	IMG_0747.JPG	4/22/2019 10:54	Silos and Loading of Final Products
2	IMG_0748.JPG	4/22/2019 12:01	Line 14 Reactor R1410 - Insulation
3	IMG_0749.JPG	4/22/2019 12:01	Line 14 Reactor R1420
4	IMG_0750.JPG	4/22/2019 12:02	Line 14 Reactor R1430